

EXHIBIT 31

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No.  
17-md-2804

Judge Dan Aaron  
Polster

This document relates to:  
The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al.

Case No. 18-OP-45090 (N.D. Ohio)

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Videotaped Deposition of
STEVE PERCH
October 18, 2018
9:00 a.m.

Taken at:

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Akron, Ohio

Stephen J. DeBacco, RPR

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1 flip to the next page, she's referring to that
2 bar chart that we talked about a little bit
3 earlier?

4 A. Correct.

5 Q. And again, I'm not going to ask
6 lots of specific questions, but would you agree
7 with me that the carfentanil deaths were
8 largely in one time -- kind of point in time in
9 2016 where you saw very significant deaths
10 associated to carfentanil?

11 A. No.

12 Q. What -- did it occur after 2016?

13 A. I will agree with you that it
14 started in the 4th of July weekend of 2016 and
15 just ballooned for the rest of 2016. It didn't
16 get any better. It got worse. And then 2017
17 was just as bad.

18 Q. Okay.

19 A. So that year and a half was
20 carfentanil. It was, you know, basically the
21 carfentanil epidemic.

22 Now, prior to that, when I first
23 started the coroner's office, as I mentioned
24 before, I would see trends. You know,
25 initially in the early 2000s, hydrocodone,

1 oxycodone, and that lasted for years. I mean,
2 you see peaks and valleys and spikes.

3 But typically what all I saw the
4 first 10 years at the coroner's office were
5 prescription meds. Very low levels of illicit
6 drugs in terms of lethal nature. Most of our
7 deaths -- and I don't have the statistics.
8 This is just the perception I had.

9 Q. Uh-huh.

10 A. The first 10 years I'm there.

11 Then, the last 10 years, I saw some
12 fluctuations. You know, the prescription -- as
13 I mentioned, we had pain management centers
14 back then, quite a few of them. As a matter of
15 fact, my last few years at City Hospital I
16 created a special drug test aimed at pain
17 management centers where I incorporated the
18 things that they wanted to see, which is the
19 opiates: oxycodone, hydrocodone, Fentanyl,
20 methadone, et cetera. And we called it the
21 pain management panel.

22 We originally created it for
23 St. Thomas Hospital. And after several weeks,
24 we were getting calls from Cleveland Clinic,
25 Aultman Hospital. Cleveland Clinic would have